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15 UNITED STATES DISTRICT COURT
16
17 DISTRICT OF NEVADA

18 CHENTILE GOODMAN,
19 Plaintiff,
20 vs.
21

22 Case No. 2:11-cv-01447-MMD-CWH

23 **JOINT STATUS REPORT**

24 LAS VEGAS METROPOLITAN POLICE
25 DEPARTMENT, a political subdivision of the
26 State of Nevada; COSMOPOLITAN
27 INTERNATIONAL COMPANY, INC., a
28 Nevada corporation; NEVADA PROPERTY 1,
29 LLC, a foreign limited liability company;
30 JOHN SEGURA; JAMES SIGNORELLO; and
31 DOES 1-30; and ROES 1-30, jointly and
32 severally,
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34 Defendants.

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36 COMES NOW Defendants, LAS VEGAS METROPOLITAN POLICE DEPARTMENT
37 (“LVMPD”), JOHN SEGURA (“Segura”), and JAMES SIGNORELLO (“Signorello”, and
38 collectively LVMPD, Segura and Signorello as “Defendants”), and Plaintiff, CHENTILE
39 GOODMAN (“Plaintiff”) jointly, by and through their undersigned counsel of record and hereby
40 submit their Joint Status Report in compliance with this Court’s Minute Order dated January 28,
41 2013 [Docket No. 100], identifying all pending Motions filed in this instant matter.

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1 A. Pending Motion(s) of Defendants:

2 On December 5, 2012, LVMPD filed its Motion for Summary Judgment [Docket
3 No. 81], and Segura and Signorello filed their Motion for Summary Judgment [Docket No. 82]
4 (collectively “Defendants’ MSJs”). Simultaneously, Defendants filed a Motion to Seal
5 Defendants’ MSJs [Docket No. 83] on December 5, 2012, which was amended on December 6,
6 2012 [Docket No. 87]. On January 15, 2013 Plaintiff filed her Response to Defendants’ MSJs
7 [Docket No. 97]. On January 25, 2013, Defendants filed a single Reply in support of
8 Defendants’ MSJs [Docket No. 99].

9 All Motion(s) filed by Defendants in this matter appear to be fully briefed for this
10 Court’s review and ruling.

11 B. Pending Motion(s) of Plaintiff:

12 On May 29, 2012, Plaintiff filed a Motion Under Rule 60 for Reconsideration of
13 Order Dismissing Cosmopolitan [Docket No. 46] (“Motion for Reconsideration”)¹. On June 14,
14 2012, Defendant Cosmopolitan filed its Response to the Motion for Reconsideration [Docket No.
15 57] and Plaintiff filed a Reply in support of the Motion for Reconsideration on June 25, 2012
16 [Docket No. 61]. Plaintiff filed a Supplement to the Motion for Reconsideration October 18,
17 2012 [Docket No. 72] and Defendant Cosmopolitan filed a Response to Plaintiff’s Supplement
18 on October 22, 2012 [Docket No. 73]. This matter is now fully briefed for the Court’s review
19 and ruling.

20 On November 1, 2012, Plaintiff filed a Motion in Limine Regarding Evidence of
21 Other Crimes, Wrongs or Acts by Plaintiff Chentile Goodman [Docket No. 74] (“Motion in
22 Limine”). Defendants filed their Response to the Motion in Limine on November 19, 2012
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24 ¹ LVMPD, Segura and Signorello have no position as to the pending Motion for Reconsideration, however to advise
the Court of all pending Motions before it, the Motion for Reconsideration is being addressed in this instant Status
Report.

1 [Docket No. 75] and Plaintiff filed her Reply in support of the Motion in Limine on November
2 29, 2012 [Docket No. 76]. The Motion in Limine is now fully briefed and ready for the Court's
3 review and ruling.

4 On December 5, 2012, Plaintiff filed her Motion for Partial Summary Judgment
5 under seal [Docket No. 84] ("Plaintiff's MSJ"). Defendants filed their Response to Plaintiff's
6 MSJ on December 27, 2012 [Docket No. 89]. Plaintiff filed her Reply on January 14, 2013
7 [Docket No. 96]. Plaintiff's MSJ is now fully briefed and ready for the Court's review and
8 ruling.

9 DATED this 4th day of February, 2013.

10 KAEMPFER CROWELL RENSHAW
11 GRONAUER & FIORENTINO

12 BY: /s/ Lyssa Anderson
13 LYSSA S. ANDERSON (Nevada Bar No. 5781)
14 8345 West Sunset Road, Suite 250
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16 **Attorneys for Defendants LAS VEGAS
17 METROPOLITAN POLICE DEPARTMENT;
18 JOHN SEGURA; and JAMES SIGNORELLO**

19 DATED this 4th day of February, 2013.

20 GRAVES & LEAVITT

21 BY: /s/ John Graves
22 John J. Graves, Jr., Esq.
23 601 South Sixth Street
24 Las Vegas, Nevada 89101
Attorneys for Plaintiff

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1 DATED this 4th day of February, 2013.

2 NERSESIAN & SANKIEWICZ

3 BY: /s/ Robert Nersesian
4 Robert A. Nersesian
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7 **Attorneys for Plaintiff**